

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE GSE BONDS ANTITRUST  
LITIGATION

Case No. 1:19-cv-01704 (JSR)

**PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF  
STIPULATION AND AGREEMENT OF SETTLEMENT WITH  
BARCLAYS CAPITAL INC.**

**PLEASE TAKE NOTICE** that Plaintiffs Joseph M. Torsella, in his official capacity as the Treasurer of the Commonwealth of Pennsylvania and statutory custodian of all Commonwealth Funds; City of Birmingham Retirement and Relief System; Electrical Workers Pension Fund Local 103, I.B.E.W.; and Local 103, I.B.E.W. Health Benefit Plan ("Plaintiffs") will, and hereby do, move the Court pursuant to Fed. R. Civ. P. 23(e) for an order:

- (1) preliminarily approving the proposed settlement with Barclays Capital Inc.;
- (2) approving Huntington National Bank as Escrow Agent;
- (3) approving A.B. Data, Ltd. as Claims Administrator;
- (4) approving proposed forms of notice to the proposed settlement class; and
- (5) authorizing notice as provided in the Order.

Submitted herewith in support of this Motion are the:

- (1) Plaintiffs' Memorandum of Law in Support of Motions for Preliminary Approval; and
- (2) Declaration of Christopher M. Burke in Support of Plaintiffs' Motions for Preliminary Approval.

Dated: December 16, 2019

s/ Christopher M. Burke  
CHRISTOPHER M. BURKE (CB-3648)  
**SCOTT+SCOTT ATTORNEYS AT  
LAW LLP**  
600 W. Broadway, Suite 3300  
San Diego, CA 92101

VINCENT BRIGANTI  
CHRISTIAN LEVIS  
MARGARET MACLEAN  
ROLAND R. ST. LOUIS, III  
**LOWEY DANNENBERG, P.C.**  
44 South Broadway, Suite 1100

Tel: (619) 233-4565  
Fax: (619) 233-0508  
cburke@scott-scott.com

DAVID R. SCOTT (DS-8053)  
AMANDA F. LAWRENCE (AL-8804)  
KRISTEN ANDERSON (KA-1965)  
DONALD A. BROGGI (DB-9661)  
THOMAS BOARDMAN (TB-0530)  
**SCOTT+SCOTT ATTORNEYS AT  
LAW LLP**

The Helmsley Building  
230 Park Ave., 17th Floor  
New York, NY 10169  
Tel: (212) 223-6444  
Fax: (212) 223-6334  
david.scott@scott-scott.com  
alawrence@scott-scott.com  
kanderson@scott-scott.com  
dbroggi@scott-scott.com  
tboardman@scott-scott.com

*Interim Co-Lead Counsel for the Class and  
Attorneys for Plaintiff City of Birmingham  
Retirement and Relief System*

CHRISTOPHER CRAIG  
Chief Counsel  
**PENNSYLVANIA TREASURY  
DEPARTMENT  
OFFICE OF THE CHIEF COUNSEL**  
129 Finance Building  
Harrisburg, PA 17120  
ccraig@patreasury.gov

*Attorney for Plaintiff Joseph M. Torsella, in  
his official capacity as the Treasurer of the  
Commonwealth of Pennsylvania*

White Plains, NY 10601  
Tel: (914) 997-0500  
Fax: (914) 997-0035  
vbriganti@lowey.com  
clevis@lowey.com  
mmaclean@lowey.com  
rstlouis@lowey.com

*Interim Co-Lead Counsel for the Class and  
Attorneys for Plaintiff Joseph M. Torsella is the  
Treasurer of the Commonwealth of Pennsylvania  
and the head of the Pennsylvania Office of the  
State Treasurer*

TODD A. SEAVER  
CARL N. HAMMARSKJOLD  
**BERMAN TABACCO**  
44 Montgomery Street, Suite 650  
San Francisco, CA 94104  
Tel: (415) 433-3200  
Fax: (415) 433-6382  
tseaver@bermantabacco.com  
chammarskjold@bermantabacco.com

LESLIE R. STERN  
**BERMAN TABACCO**  
One Liberty Square  
Boston, MA 02109  
Tel: (617) 542-8300  
Fax: (617) 542-1194  
lstern@bermantabacco.com

*Attorneys for Plaintiffs Electrical Workers  
Pension Fund Local 103, I.B.E.W., and Local  
103, I.B.E.W. Health Benefit Plan*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 16, 2019, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

s/ Christopher M. Burke

Christopher M. Burke